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March 24, 2008

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City of Los Angeles
Department of Planning
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Notice of Preparation Comments
Sylmar Community Plan Project
Case Nos. CPC-2006-5569-CPU and ENV-2006-5624-EIR

Dear Ms. Cema:

The final form and content of the Sylmar Community Plan(plan) will have great bearing on the creation of the Rim of the Valley Trail from the Pacoima Wash to the west side of Interstate 5. The plan will also play a crucial roll in determining whether or not additional high density development with major landform alteration occurs on the west-facing slope of the Pacoima Canyon watershed just west of Lopez Canyon. We urge the City to incorporate all necessary measures in both the plan and the Draft Environmental Impact Report (DEIR) to maximize conditions conducive to a quality Rim of the Valley (ROV) Trail and the least amount of development legally possible in the undeveloped portions of the Pacoima Canyon watershed.

ROV Trail Corridor

Concerns about the ROV Trail Corridor will be addressed first beginning from Interstate 5. It is imperative that the plan show all possible sections of the trail corridor from I5 to the Mountains Recreation and Conservation Authority's (MRCA) existing trail through the Saddletree Ranch open space (just west of Stetson Ranch Park). The plan should go to great lengths to include potential methods of getting equestrians and pedestrians safely across the Foothill Boulevard bridge over I5.

The trail alignment from the east side of Foothill Boulevard to Saddletree Ranch has been moved a least twice to accommodate developer needs to the substantial detriment of the trail. The latest snafu is that the City approved dozens of residential units on top of a pair

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of Los Angeles County trail easements. The houses are built and the County apparently relented in the past two weeks and agreed to accept different trail easements with demanding any substantive concessions. The DEIR must address this history to provide full disclosure to City decision makers. Even if a patchwork trail alignment has been put together for this section of the ROV Trail, and its connectors, with a combination of City and County easements, the plan and the DEIR must analyze and show what potential alternative sub-alignments would provide the best trail connections and user experience. Those alternative alignments must consider a route along the northern edge of the Cascades Golf Course. The owner of the course may not want that alignment, but if the plan shows the alternative(s) then the next time residential or commercial development is proposed to be intensified within the existing development footprint, or proposed for the now open golf course area, that superior trail exaction can be easily made. The current trail through the commercial development, under power lines, by houses and abutting a golf course is not an ideal trail alignment.

The Rim of the Valley Trail Corridor Master Plan includes a spur trail northward from the Cascades Golf Course into the greater Grapevine Canyon area. It is imperative that both the plan and the DEIR show a series of possible trail alignments from the primary east-west ROV Trail to several points along the northern plan boundary. Because the Cascades project has been modified so much, and because the development plans for private open space located within the City limits to the north is not public information, the DEIR analysis must include numerous alternatives to ensure that the minimum necessary trail alignment planning is advanced and that functional trail exactions can be easily obtained.

The section of the ROV Trail from Stetson Ranch Park to County-owned Olive View medical center area is unfortunately limited to a long, dusty, shade-free section of trail located parallel to and just north of the 210 Freeway. Although a northern route (around existing residential development) would encounter steep terrain, the plan should include such a conceptual route to keep open, and foster, the possibility of a section of trail with superior user experience attributes. Every square foot of the undeveloped private open space between the City boundary and the existing residential development should retain or be changed to the most restrictive zoning possible. This area is extremely steep and provides key viewshed, watershed and wildlife habitat. Any existing deed restrictions, Conditions of Approval or CEQA mitigation measures that prohibit or restrict development in these areas must be researched and fully disclosed in the both the plan and the DEIR.

The next section of the ROV Trail Corridor and trail alignment within the City boundary is

located just west of the Pacoima Wash. The entire section of natural area between existing residential development and the City boundary should be designated ROV Trail Corridor Alignment Zone in the plan. Terrain makes this a difficult section of trail to construct and every square foot of land that is made available will increase the probability of a high quality trail being constructed some day.

Pacoima Wash - Lopez Canyon Natural Area

The scenic and ecologically intact west-facing slope area of Pacoima Wash watershed is under constant development pressure. These National Forest-adjacent lands provide both critical viewshed to a large complex of public lands along the Pacoima Wash corridor and key informal trail connections from surrounding communities into the National Forest. Every square foot of the undeveloped private open space between the City boundary and the existing residential development should retain or be changed to the most restrictive zoning possible. Any existing deed restrictions, Conditions of Approval, or CEQA mitigation measures that prohibit or restrict development in these areas must be thoroughly researched and fully disclosed in the both the plan and the DEIR.

The issue of the single means of access from Maclay Avenue limiting additional development in this area must be fully analyzed and disclosed in the DEIR. Any documents or maps in the City files that forecast how development could, or already has been proposed to, extend eastward towards Lopez Canyon must be exhaustively collected and analyzed. All preliminary plans for road extensions must be shown in detail and analyzed in the DEIR. This issue is critical to expose to decision makers and for DEIR preparers to assess the potential impacts to the plan area.

The DEIR must recognize that every acre of that National Forest-adjacent habitat block is integrally connective to, and contributive to, the core habitat of the San Gabriel Mountains. We advocate any reduction in development density in these areas and encourage policies that require clustering as close and possible to existing paved roads.

Pacoima Wash and Other Flood Control Channels

The plan area includes the regionally significant public resource of the Pacoima Wash from Gavina Street downstream to the border of the City of San Fernando. All public and private lands along the wash should be under a special overlay zone that reflects the wash's value as a recreational corridor, habitat area, storm water cleaning resource, and major

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visual amenity. Both the plan and the DEIR must disclose in detail existing habitat along the wash and all both existing and potential public trail connections. Those connections would include public trailheads to get into the wash trail system.

Other flood control channel rights-of-ways also bisect the plan area from north to south. These public lands are critical for future trail connections, for storm water infiltration, and groundwater recharge. The DEIR must analyze these inherent values and assess whether the proposed plan is adequately protecting and facilitating the maximum multi-benefit public use of these lands. The new plan must show public trails along both sides of every flood control channel where adequate land exists. That is the only way of preserving such options even if they never happen because of legal or physical constraints.

Please contact our staff if you need any assistance in demarcating any trail corridors in the hillside areas or along the flood control channels in and adjacent to the plan area.

Please address any questions and all future documents to Paul Edelman of our staff at the above letterhead address and by phone at 310-589-3200 ext. 128.

Sincerely,

RONALD P. SCHAFER
Chairperson